

THOMAS J. ORR
321 HIGH STREET
BURLINGTON, NJ 08016
(609)386-8700
tom@torrlaw.com
ATTORNEY FOR DEBTORS

In Re

Anthoney Mayoros, Sr. and
Sandra Mayoros,

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Case No. 18-35206 (MBK)
Chapter 13

CERTIFICATION IN SUPPORT OF MODIFIED
PLAN AND IN OPPOSITION TO TRUSTEE'S
CERTIFICATION OF DEFAULT

Hearing Date: March 2, 2021
Oral Argument: Requested

Debtors.

Anthoney Mayoros, Sr. and Sandra Mayoros certify as follows:

1. The Trustee objected to our modified plan and filed a certification of default based on:

a) arrears: we paid \$980 on January 13, 2021 and a payment of \$560 is in transit. We expect to pay \$585 before the hearing date. We are on track to complete our modified plan on time;

b) objection by MidFirst Bank: a consent order was entered on December 23, 2020 (docket 54). The consent order does not impact plan payments;

c) updated proof of income: pay stubs were uploaded to the trustee's web site on February 11, 2021;

d) disposable income: we believe our budget is fair based on our income and family size. Both of our incomes have been impacted by COVID. Right now, we are both working full time hours. This may change depending on the continuing impact of the virus

and economic recovery. For example, Sandra's hours were previously drastically reduced because of her employer's work flow and Anthoney's job is dependent on Six Flag's ability to resume normal operations;

e) threshold: we agree to pay a minimum of \$1,570 to unsecured creditors.

Our modified plan will pay more:

MidFirst Bank	\$16,288	
Priority NJ Tax	\$3,234	
Priority IRS Tax	\$8,688	
Attorney Fee	\$1,500	(estimated pending fee app)
Sub-Total	\$29,710	
Trustee Commission ¹	\$3,301	
Sub-Total	\$33,011	
Balance on Hand	-\$920	(excluding payment(s) in transit)
Balance to Complete	\$32,091	
Plan Payments	\$33,930	(\$585 a month for 58 months)
Remaining	\$1,839	(unsecured claims total \$5,917)

f) 2019 tax return: uploaded to the trustee's web site on February 11, 2021.

2. We request that our modified plan be confirmed and that the trustee's certificate of default be denied.

3. We certify under penalty of perjury that the foregoing is true and correct.

Date: February 23, 2021

/s/Anthoney Mayoros, Sr.

Date: February 23, 2021

/s/Sandra Mayoros

¹ Based on 10% commission. At 6.1% the commission would be \$1,930 resulting in \$3,210 remaining for a dividend of about 54% to unsecured creditors.